# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

WARREN RICHARDS, on behalf of himself and others similarly situated,

Plaintiff,

v.

CASE NO. 1:25-CV-1188-JRS-MJD

GOOSE CREEK CANDLES LLC,

Defendant.

### GOOSE CREEK CANDLES LLC'S UNOPPOSED MOTION TO AMEND ANSWER

Goose Greek Candles LLC, pursuant to Fed. R. Civ. P. 15(a), the Scheduling Order entered on August 28, 2025 (DN 10), and the Case Management Plan (DN 21), moves for leave to file its amended answer, attached as Exhibit A. Goose Creek seeks to amend its answer to clarify affirmative defense thirteen, out of an abundance of caution, so as to ensure the defenses set forth in 47 U.S.C. § 227(c)(5) are fully set forth. Counsel for Goose Creek has conferred with Plaintiff's counsel, who, by email, has confirmed he does not oppose the amendment. *See* Fed. R. Civ. Proc. 15(a)(2).

Goose Creek respectfully requests that the Court grant this motion and order that the amended answer attached as Ex. A be filed and entered into the record.

## Respectfully submitted,

### /s/ Alisa Micu

Chadwick A. McTighe Alisa Micu Stites & Harbison PLLC 400 West Market Street, Suite 1800 Louisville, KY 40202

Tel: (502) 587-3400

E-mail: <a href="mailto:cmctighe@stites.com">cmctighe@stites.com</a>
E-mail: <a href="mailto:amicu@stites.com">amicu@stites.com</a>

Counsel for Goose Creek Candles LLC

## **CERTIFICATE OF SERVICE**

I certify that I served the foregoing document on the following counsel of record by email on October 31, 2025:

Anthony I. Patronich 350 Lincoln Street, Suite 2400 Hingham, MA 02042 anthony@patronichlaw.com

/s/ Alisa Micu

Counsel for Goose Creek Candles LLC

10577327:v1